this field, but that may not be understood by those who do not, since "conventional" can have different meanings in different contexts.

In the field of stereotaxic holders for rats, a certain historical development needs to be understood, which can be summarized briefly as follows:

(1) David Kopf and the company he founded (Kopf Instruments) made a major advance in stereotaxic manipulators small enough to work on rats, in about the 1950's or 1960';

(2) the unit they sold, known as the Kopf Model 900, became the worldwide standard for such instruments, and totally dominated that market for decades;

(3) after the patents expired, the first important competitor that entered the market (the Stoelting company) decided to offer a lower-cost manipulator. That company decided to make its manipulator easily and exactly retrofittable to the base plate of the Kopf Model 900 unit.

That was a logical decision, by the Stoelting company, since (i) manipulators are complex, they contain many moving parts, and they must remain precise, but (ii) a base plate is totally inert. A base plate is essentially nothing more than a flat steel plate, with a few threaded holes drilled into it so that other more complicated subassemblies (the manipulator, and the U-frame) can be affixed to it. The base plate merely provides enough surface area and weight to provide a solid, stable, and inert working surface, to support the rat.

The steps for removing an old and worn manipulator from the industry-standard Kopf Instruments Model 900 base plate, and bolting a new manipulator (regardless of who made or sold it) to the base plate, are very simple. Two bolts are unscrewed, to release and remove the old manipulator. A new manipulator is aligned next to the two bolt holes, and the two bolts are replaced. It's that simple. Indeed, the steps are so simple and easy that anyone can detach a manipulator from the left side of a

base plate, and move it to the right side of the base plate, within less than a minute, if there is a need to do so for some particular experiment. This was accomplished merely by providing identically-spaced holes on both the right side and the left side of every base plate, as a standard feature.

As a result of that history, the phrase, "a base plate of a conventional non-digital stereotaxic holder" is sufficiently clear and definite, to anyone who works in that field, to be readily understood and clear in its meaning. The Examiner must recognize that fact and take it properly into consideration, and cannot ignore or discount the importance of that phrase when intepreting the claims as amended.

By contrast, the base plate designed by Cartesian Research, which created the first stereotaxic rat holder having digital readouts, was designed in a completely different manner. As just one illustration of the difference, its base occupies 324 square inches, which is more than twice the size of the Kopf Model 900 and other conventional units, which occupy 136 square inches. The Cartesian Research unit sold for a very high price, and its unique and non-interchangeable base plate apparently and presumably was intended, at least in part, to help ensure that low-cost competitors could not simply make their own bolt-on devices that could be easily affixed to it. Therefore, the statement in the office action, "Examiner considers the Saracione base plate to be conventional", is not correct, because of factors the examiner was not aware of. The Examiner's statement, "Applicant did not state that the Saracione base plate was not conventional", needs to be directly addressed by the Applicant, because that base plate was not conventional.

The Office Action states, "the companies referenced by applicant in [its] arguments have nothing to do with the prior art used in the rejections." That is not correct; in fact, Kopf Instruments actually purchased the Cartesian Research company, and had full access to its records, employees, and expertise; and yet, as stated in an affidavit previously submitted, even after acquiring the Cartesian Research company, Kopf Instruments still

could not match the accomplishment of the applicant company, until after it had purchased and disassembled one of the applicant company's units.

Interview; Society for Neurosciences Annual Conference

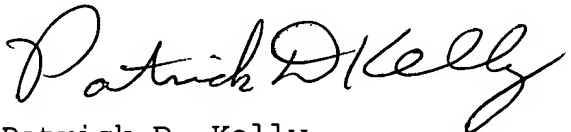
By coincidence, the first-named inventor will be in Washington, DC on Thursday, November 10, to help run a display booth at the annual Society of Neurosciences meeting, which happens to be in Washington this year. That inventor, Dr. Chuck Scouten, would like to be present during the interview between the examiner and the undersigned, to directly address any questions that may arise.

In addition, it may be possible for the Applicant company (which will be an exhibitor at the conference) to help obtain a courtesy pass to the conference for the Examiner (and possibly for one or more other examiners as well), if they work with patent applications relating to neurology. That meeting may provide an excellent opportunity for examiners to actually see, for themselves, the types of devices and processes that are being developed and sold by people and companies that specialize in this field.

The undersigned will be in touch with the examiner by phone, next week, to find out whether she and/or any of her coworkers would like to visit that conference, and if so, to see whether the necessary arrangements can be made.

During the week of November 7-11, the undersigned attorney can be reached at 314-750-1111, or by leaving a message at 314-822-8558.

Respectfully submitted,



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